

The Honorable Richard A. Jones

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GETTY IMAGES, INC., a Delaware  
corporation,

Plaintiff,

v.

ROXANNE MOTAMEDI, an individual,

Defendant.

No. 2:16-cv-01892-RAJ

**MOTAMEDI’S RESPONSE TO  
GETTY IMAGES’S MOTION TO  
REDACT AND SEAL PORTIONS OF  
THE TRANSCRIPT OF THE  
HEARING REGARDING  
PRELIMINARY INJUNCTION**

Without conceding that any of the information that Plaintiff Getty Images, Inc. (“Getty Images”) seeks to redact constitute trade secrets or any other competitively sensitive or confidential information, Defendant Roxanne Motamedi (“Motamedi”) does not oppose Getty Images’s Motion to Redact and Seal Portions of the Transcript of the Hearing Regarding Preliminary Injunction. (Dkt. No. 42.)

However, Motamedi does write to correct Getty Image’s incorrect assertion that “Getty Images’s clients and contributors . . . [are] not information that Getty Images shares publicly.” (Dkt. No. 42, 3.) In fact, the six clients that Getty Images identifies—*People* magazine, the website TMZ, the Academy Awards, the Grammy Awards, the Golden Globe Awards, and *The Hollywood Reporter*—are all disclosed on Getty Images’s website. (Declaration of

Matthew W. Schmidt ISO of Defendant's Response to Getty Images's Motion to Redact and Seal Portions of the Transcript, Exhibits A-G.) *The Hollywood Reporter* has also disclosed its exclusive partnership with Getty Images on its own website. (*Id.* at Exhibit H.) In addition, the two contributors that Getty Images identifies—John Shearer and Jeff Vespa—are likewise disclosed on Getty Images's website and, in the case of John Shearer, on his personal website and Twitter profile as well. (*Id.* at Exhibits I-M ("He recently moved from Los Angeles to Nashville, where he currently holds the role of Nashville Bureau Chief for Getty Images.").)

DATED: February 22, 2017.

**SAVITT BRUCE & WILLEY LLP**

By: /s/ Sarah Gohmann Bigelow

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Attorneys for Defendant Roxanne Motamedi

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was filed electronically with the Court and thus served simultaneously upon all counsel of record, this 22nd day of February, 2017.

  
Ashlee Hooten